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Telephone: 520-620-7300 4 5 Email: rui.wang@usdoj.gov CR25-00603 TUC-JCH(MAA) 6 Attorneys for Plaintiff IN THE UNITED STATES DISTRICT COURT 7 FOR THE DISTRICT OF ARIZONA 8 No. 9 INDICTMENT 10 United States of America, 18 U.S.C. §§ 922(a)(6) & 924(a)(2) (Making False Statements in Connection with Acquisition of VIO: 11 Plaintiff, 12 Firearms) VS. Counts 1-2 13 Alexandria Jordan Pierson, 18 U.S.C. § 924(d); 28 U.S.C. § 14 Defendant. 2461(c); Forfeiture Allegation 15 16 THE GRAND JURY CHARGES: 17 COUNTS 1 & 2 18 19

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On or about the dates listed below, in the District of Arizona, Defendant ALEXANDRIA JORDAN PIERSON knowingly made false statements and representations in connection with the acquisition of firearms to the business listed below, which were intended and likely to deceive the business as to a fact material to the lawfulness of the sale of firearms by the business, which was licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of the listed business, in that ALEXANDRIA JORDAN PIERSON stated that she was the actual transferee/buyer of the firearms, whereas in truth and fact, she was knowingly acquiring the firearms on behalf of another individual:

Count	Date	FFL	Firearms
11			Radikal GForce Arms MKX GF00 12-
1	03/16/2023	John's Guns & Ammo	gauge shotgun
2	03/21/2023	John's Guns & Ammo	Pioneer Arms Sporter 7.62x39mm rifle

In violation of Title 18, United States Code, Sections 2, 922(a)(6), and 924(a)(2).

FORFEITURE ALLEGATION

Upon conviction of Counts One and Two of this Indictment, defendant, ALEXANDRIA JORDAN PIERSON, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in the commission of the offense, including, but not limited to: one (1) Radikal GForce Arms MKX GF00 12-gauge shotgun, serial number 21-106234; and one (1) Pioneer Arms Sporter 7.62x39mm rifle, serial number PAC1189068.

If any of the property described above, as a result of any act or omission of the defendant: a) cannot be located upon the exercise of due diligence; b) has been transferred or sold to, or deposited with, a third party; c) has been placed beyond the jurisdiction of the court; d) has been substantially diminished in value; or e) has been commingled with other property which cannot be divided without difficulty, it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the above-described forfeitable property, including, but not limited to, all property, both real and personal, owned by the defendant.

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